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Attorney for KEITH JAMES WILSON

E-Filed on January 8, 2010

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

IN RE)	Case No: 09-33096bam
)	Date: 02/09/2010
KEITH JAMES WILSON)	Time: 1:30 pm
)	Chapter 7
Debtor.)	Trustee Yvette Weinstein

Answer/Opposition to Motion of Wells Fargo Bank, NA For Relief from Automatic Stay filed January 6, 2010

Debtor KEITH JAMES WILSON, as represented by his legal counsel, Dorothy G. Bunce, of A FRESH START hereby answers and opposes the Motion of Wells Fargo Home Mortgage for Relief from Stay as follows:

ANSWER TO FACTUAL ALLEGATIONS

Debtor admits the allegations contained in paragraphs 1, 9, and 10 of the Motion. Debtor denies all remaining factual allegations.

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AFFIRMATIVE DEFENSE

Movant has not shown the irreparable harm necessary to justify lifting the stay. Even if Movant is entitled to relief from the stay, the stay should not be terminated. The Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, Debtor asks that the motion be dismissed and/or denied.

Dated: January 8, 2010.

A FRESH START

By/s/ *Dorothy G. Bunce*
Original Signature
Dorothy G. Bunce, Esq.
Nevada Bar # 0756
2037 Franklin Ave
Las Vegas, Nevada 89104
Attorney for Debtor

CERTIFICATE OF SERVICE BY MAIL

The undersigned hereby certifies that on the date shown below, I placed into the United States Mail a true and correct copy of the Answer/Opposition to Motion of Wells Fargo Bank, NV For Relief from Automatic Stay filed January 6, 2010, postage prepaid, addressed to:

Wilde & Associates
Gregory L Wild Esq
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Mark S Bosco, Esq
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2525 E Camelback Rd Ste 300
Phoenix AZ 85016

DATED: January 8, 2010.

/s/ *Dorothy G Bunce*
Original Signature
An employee of A FRESH START

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